

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 19-CR-235

**MICHAEL C. SIEGEL and
SCOTT D. HOEFT,**

Defendants.

**PROTECTIVE ORDER REGULATING
THE DISSEMINATION OF DISCOVERY MATERIALS**

Upon the unopposed motion of the United States of America, by its attorneys, Matthew D. Krueger, United States Attorney, and Erica J. Lounsberry and Richard G. Frohling, Assistant United States Attorneys, pursuant to Federal Rule of Criminal Procedure 16(d)(1),

IT IS ORDERED THAT:

(1) Defense counsel will be provided with a single copy of all discovery materials. Said materials may mask the identification of certain cooperating witnesses, as well as the addresses, telephone numbers, and other identifying information relative to those persons. As additional materials become available, and/or it becomes appropriate for the identity of certain persons to be disclosed, defense counsel will be notified by the United States Attorney's Office.

(2) To protect sensitive materials, the individual defendants will be allowed to retain only a limited subset of the discovery outside of their counsel's office, namely, any

materials that were seized from them or their accounts and devices, such as Facebook records, digital forensic copies of their phones, and bank records. They also may retain reports of their own statements. Unless both the government and defense counsel agree to include additional materials in the categories of items that may be retained by the individual defendants, the defendants shall be prohibited from making personal copies of the additional discovery materials provided to their counsel. The defendants may make arrangements to review the additional discovery at their counsel's offices, or at the United States Attorney's Office.

(3) Defense counsel may make copies of the discovery materials as necessary to prepare the defense of the case and may furnish these copies to members of the defense team, including licensed investigators employed by defense counsel, experts working with defense counsel, and defense counsel's support staff. Defense counsel may only share information contained in the discovery as needed to provide a defense for their clients in this case, including any direct appeal. Defense counsel and other members of the defense team may use the discovery materials to question or prepare potential witnesses but shall not allow such witnesses to retain copies of any of the discovery materials.

(4) Prior to disclosing any discovery materials to any member of their defense teams, counsel for the defendants will inform persons receiving discovery of the disclosure limitations of the protective order.

SO ORDERED this 21st day of January, 2020, at Milwaukee Wisconsin.

s/Nancy Joseph
NANCY JOSEPH
United States Magistrate Judge